

FILED VIA MAIL
JACKSONVILLE, FLORIDA

MAR 03 2015

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF FLORIDA
(Jacksonville Division)**

CLERK, U.S. BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA

In re:

CASE 3:15-BK-341

Chapter 7

REMI GUNN

Debtor,
_____ /

**CREDITOR'S RESPONSE TO ANSWER
INVOLUNTARY PETITION**

Creditor, James M. Thompson, *pro se*

A, THIS

RESPONSE TO ANSWER TO INVOLUNTARY PETITION Admitted.

1. Admitted.
2. Not admitted, the INTERNAL REVENUE SERVICE is being informed, a list of Creditors is awaited.
3. SEE: Para. B. 1.
4. Denied, Creditor puts Debtor to STRICT PROOF THEREOF her Creditor has made any false, fictitious and fraudulent statement. Creditor puts Debtor to STRICT PROOF THEREOF her allegation. Creditor filed the Petition in "good faith" to collect a valid debt in compliance of due process.
6. Denied, Creditor puts Debtor to STRICT PROOF THEREOF her all setting out each and every issues alleged.
- d, Creditor puts Debtor to STRICT PROOF THEREOF her allegation ebtor has suffered damages as a result of the conduct of the Creditor. It

is ~~the~~ Creditor that has and is continually damaged by the actions of the Debtor.

8. ~~Not admitted~~, Creditor's petition was filed in "good faith" to recover a law debt. Has amended the petition and reduced the claim to comply with the limits for singular filing of the petition.

9. Denied, Creditor puts Debtor to STRICT PROOF THEREOF her allegations to STRICT PROOF THEREOF.

10. Objection, not relative, this is an attempt by Debtor's Attorney to obfuscate the legal rights and the Rules and Regulations of the Honorable Court.

Objection, not relevant, the ORDER of the court is valid in compliance of U.S. Bankruptcy Rules and Regulations. SEE: This Court's notice for a PRETRIAL ORDER for A PRETRIAL Hearing set for April 29, 2015 at 3:00

PM. **EXHIBIT 1.**

B. APPLICATION BY CREDITOR FOR LEAVE TO AMEND PETITION

1. Creditor requests to take leave to amend the Petition to \$13,000.00 in order to comply with RULE 303.

2. Creditor, having limited *pro se* knowledge, evidently was mistaken as he was of the opinion that it was incumbent upon the Debtor to notify any and all Creditors including the Internal Revenue Service of the pending Chapter Bankruptcy Petition.

Creditor awaits resolution of the matters at hand and will continue to make every attempt to resolve the issues through Counsel.

WHEREFORE, Creditor seeks the following relief: entry of an order sustaining
Creditor's pleadings in their entirety and any additional relief just and proper.

All rights reserved.

Respectively submitted this the 2nd day of March, 2015.


JAMES M. THOMPSON, Creditor, *pro se*
15E Laguna Avenue
Orlando, FL 32807
Phone: 407.283.3749

CERTIFICATE OF SERVICE

I CERTIFY that a copy of the foregoing has been served by the U.S. Mail on March 2, 2015, to the Clerk of the United States Bankruptcy Court for the Middle District of Florida, United States Trustee 400 W Washington Street, Ste. 1100, Orlando, FL 32801 and Richard A. Perry, 820 East Fort King Street, Ocala, Florida 34471-2320.


By: 
JAMES M. THOMPSON, *pro se*

EXHIBIT 1.

[3G1711] [Pretrial Order – General Case]

UNITED STATES BANKRUPTCY CO
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

Case No. 3:15-bk-00341-PMG
Chapter 7

Gunn
NE 17th Court
, FL 34470

Debtor(s) /

PRETRIAL ORDER

A PRETRIAL Hearing on the Involuntary Petition filed by Petitioning Creditors shall be held on April 29, 2015 at 3:00P.M. in 300 N. Hogan Street, Jacksonville, FL 32202, Fourth Floor – Courtroom A.

Counsel for all parties are hereby ordered to confer with opposing counsel prior to the Pretrial Hearing. Said conference shall be initiated by Movant's counsel. Counsel shall jointly prepare and submit in writing a document captioned "JOINT PRETRIAL STATEMENT." The Pretrial Statement shall be filed with the Court five (5) business days prior to the Pretrial Hearing.

The Joint Pretrial Statement shall contain:

FOR THE MOVANT

- A. A list of all pleadings and pending motions.
- B. A brief statement of the theory of each cause of action including legal authority for same.
- C. A brief summary of Plaintiff's contentions of facts in support of each cause of action, AND the evidence upon which each of the facts is contended.

FOR THE DEBTOR

A brief statement of the theory of Debtor's defenses or counterclaims, interests, et al.
A brief summary of contentions of facts in support of the legal theories and the evidence to be relied upon to establish each of the facts contended.

FOR ALL PARTIES THROUGH COUNSEL

- A statement of all admitted or uncontested facts.
- B. Each party's brief statement of contested facts.
- C. Each party's statement of contested legal issues.
- D. A statement that parties consent to the jurisdiction of the Court.
- E. A statement that counsel has conferred with opposing counsel and has made a good faith endeavor to settle the case.

Each of the above is to be incorporated in one document which is to be signed by all attorneys prior to filing with the Court as required above.

At the Pretrial Hearing the Court will hear any pending motions, set for time for filing any additional pleadings, completion of discovery, the exchange of exhibit lists, witness lists, the date for filing objections to admissibility of evidence, consideration of subsequent motions, the trial date, and any other additional matters.

Appropriate Attire. You are reminded that Local Rule 5072-1(b)(16) requires that all persons appearing in court should dress in business attire consistent with their financial abilities. Shorts, sandals, shorts without collared shirts, including tee shirts and tank tops, are not acceptable.

Avoid delays at Courthouse security checkpoints. You are reminded that Local Rule 5073-1 restricts the use of cellular telephones and, except in Orlando, computers into the Courthouse absent a specific order of authorization issued beforehand by the presiding judge. Please take notice that as an additional security measure a photograph is required for entry into the Courthouse.

NOTE: Failure to comply with this Pretrial Order shall result in appropriate sanctions.

DONE and ORDERED in Jacksonville, Florida, this 20th day of February, 2015



Paul M. Glenn
United States Bankruptcy Judge